

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Application of: Knott *et al.*
Serial No.: 10/829557
Filing Date: April 22, 2004
Confirmation No.: 6361
Group Art Unit: 2614
Examiner: Patel, Hemant Shantilal
Title: *User Interface for "How to Use" Application of Automated Self
Service Call Center*

MAIL STOP – APPEAL BRIEF - PATENTS
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/jason w deats/
Jason W. Deats

June 24, 2009
Date

APPEAL BRIEF

In support of a Notice of Appeal filed on March 24, 2009 in response to a Final Office Action mailed November 24, 2008 (the "Office Action"), Appellant hereby submits this Appeal Brief pursuant to 37 C.F.R. § 41.37 with a contemporaneously filed petition extending the period for response.

I. REAL PARTY IN INTEREST

The real party in interest is:

AT&T Knowledge Ventures, L.P.
645 E. Plumb Lane
Reno, Nevada 89502

by virtue of an assignment from the inventors to SBC Knowledge Ventures, L.P., duly recorded on December 4, 2007, at Reel 020192, Frame 0779, in the Assignment Branch of the U.S. Patent and Trademark Office; and a change of name from SBC Knowledge Ventures, L.P. to AT&T Knowledge Ventures, L.P., duly recorded on December 6, 2007 at Reel 020215, Frame 0680, in the Assignment Branch of the U.S. Patent and Trademark Office.

II. RELATED APPEALS AND INTERFERENCES

There are no known appeals or interferences which will directly affect or be directly affected by or have a bearing on the Board's decision regarding this appeal.

III. STATUS OF CLAIMS

<u>Status</u>	<u>Claims</u>
Pending	1-22
Rejected	1-22

Appellant presents claims 1-5, 8, 13, 19 and 21-22 for appeal.

IV. STATUS OF AMENDMENTS

No amendments have been filed subsequent to the final rejection.

V. SUMMARY OF CLAIMED SUBJECT MATTER

In the following summary, references to drawings are indicated by figure (FIG.) and reference numeral #XXXX and references to the specification are indicated by page and line numbers referring to the application as filed on April 22, 2004.

Independent claim 1 recites a method for providing a verbal dialogue interface for a caller to an automated self-service how to use (HTU) call system. *See, e.g.,* page 4, lines 1-9. The method includes grouping services or products (other than the HTU call system) into categories and associating one or more HTU topics with each service or product. *See, e.g.,* page 7, lines 23-28. An HTU dialogue module is stored for each topic such that the dialogue module can be played as a voice message of HTU instructions to a caller. The HTU instructions are operating instructions for the service or product associated with the HTU topic corresponding to the HTU dialogue module. Some HTU topics have two or more dialogue modules to be played as a set and different topics may have different numbers of dialogue modules. The method includes, during a call from a caller, prompting the caller to name or describe a service or product or to ask for a list of services or products and receiving a response from the caller. *See, e.g.,* page 6, lines 20-24. In response to prompting the caller, if the caller asks for a list of services or products, the method includes providing a spoken list of categories and receiving a response from the caller. *See, e.g.,* page 6, lines 28-30. Also, the method includes recognizing the caller's response such that unsupported services or products are recognized. *See, e.g.,* page 7, lines 7-15. A determination is made whether the response from the caller is to be disambiguated. *See, e.g.,* page 8, lines 9-20. Disambiguating includes determining if the response corresponds to a category having more than one service or product, providing a list of services or products within that category, prompting a caller for response, and recognizing the caller's response. *See, e.g.,* page 8, lines 9-30. Based on one or more of the caller's responses, the method includes recognizing the caller's selected service or product. *See, e.g.,* page 9, lines 2-5. The method further includes providing the caller with a list of topics associated with the selected service or product and recognizing the caller's selected topic. *See, e.g.,* page 9, lines 6-9. Still further, the method includes playing, to the caller, the HTU instructions in the HTU dialogue module stored for the selected topic such that if the selected topic has two or more associated dialogue modules to be played as a set, the caller may request, to have repeated, the HTU instructions in any selected HTU dialogue module in the set. *See, e.g.,* page 11 lines 8-25. Claim 1 further recites that each of the prompting and providing steps are part of a unique dialogue module associated

with that step, such that each dialogue module has at least one timeout process and at least one retry process.

Independent claim 2 recites a method of providing a verbal dialog interface for a caller to an automated self-service “how to use” (HTU) call system. *See*, e.g., page 4, lines 1-9. The method includes grouping services or products (other than the HTU call system) into categories, associating one or more HTU topics with each service or product, and storing at least one HTU dialog module for each topic. *See*, e.g., page 7, lines 23-28. HTU instructions are operating instructions for the corresponding services or products, and dialog modules can be played as a voice message of HTU instructions to the caller. Some topics have two or more dialog modules to be played as a set, and different topics may have different numbers of dialog modules. During a call, a caller is prompted to select a service or product for which the caller desires HTU instructions. *See*, e.g., page 6, lines 20-24. One or more service or product responses is received from the caller. Based on one or more of the caller’s responses, the caller’s selected service or product is recognized and the caller is provided with a list of topics associated with the selected service or product. The caller’s selected topic is recognized. *See*, e.g., page 9, lines 2-5. The HTU instructions in the at least one HTU dialog module stored for the selected topic is played to the caller such that if the selected topic has two or more associated dialog modules to be played as a set, the caller may request to have the HTU instructions in any selected HTU dialog module in the set repeated. *See*, e.g., page 6, lines 28-30.

Independent claim 13 recites a system for providing a verbal dialog interface for a caller to an automated self-service “how to use” (HTU) call system. The system includes a Get Service Name module (e.g., item 1050 in FIG. 1A) configured to prompt the caller to name or describe a service or product (other than the HTU call system) or to ask for a list of services or products (other than the HTU call system) and to recognize the caller’s response. *See*, e.g., p. 6, lines 16-20. A Get Category Name module (e.g., item 1075 in FIG. 1A) is configured to provide the caller with a list of service or product categories, to receive a selection from the caller, and to recognize the caller’s selection from the list of categories. *See*, e.g., p. 7, lines 23-31. A Get Information module is configured to provide the caller with a list of topics associated with a

selected service or product and to recognize the caller's selected topic. *See, e.g.,* item 1305, FIG. 1B. Embodied systems include Information modules that provide the caller with verbal HTU instructions associated with the selected topic. *See, e.g.,* p. 4, lines 14-21, p. 11, lines 14-19 & elements 2000, 2005, 2010 in FIG. 1B. The HTU instructions include instructions for using the selected service or product. At least one topic has more than one associated Information module and different topics having different numbers of Information modules. *See, e.g.,* p. 11, lines 22-25.

VI. GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL

Whether claims 1-5, 8, 13, 19, and 21-22 are unpatentable under 35 U.S.C. §103(a) over U.S. Patent Application Publication No. 2005/0089150 A1 (hereinafter "*Birkhead*") and U.S. Patent Application Publication No. 2002/0091566 A1 (hereinafter "*Siegel*").

VII. ARGUMENT

The claims argued separately below do not stand or fall together.

A. Rejection of Claims 1-5, 8, 13, 19, and 21-22 under 35 U.S.C. §103(a) as unpatentable over *Birkhead* in view of *Siegel*

Claims 1-5, 8, 13, 19 and 21-22 were rejected under 35 U.S.C. §103(a) as unpatentable over *Birkhead* and further in view of *Siegel*.

Claim 1

The rejection of claim 1 is improper because no combination of the references teaches or suggests all of the claim elements. The rationale to support a conclusion that the claim would have been obvious is that all the claimed elements were known in the prior art and one skilled in the art could have combined the elements as claimed by known methods with no change in their respective functions, and the combination yielded nothing more than predictable results to one of ordinary skill in the art. *See, KSR International Co. v. Teleflex, Inc.*, 550 U.S. 398 (2007).

Claim 1 recites "'how to use' (HTU) instructions," in which "HTU instructions are operating instructions for [a] service or product associated with [an] HTU topic." [emphasis added] *See*, claim 1, lines 2, and 6-7. The Examiner interprets operating instructions to include

information that indicates the “effect of operation of a drug when administered to a person.” *See*, Office Action, ¶ 3, line 12. Applicant respectfully disagrees with the Examiner’s interpretation of operating instructions. The claimed HTU instructions which are operating instructions do not encompass information that indicates the “effect of operation of a drug when administered to a person.” *See*, Office Action, ¶ 3, line 12. Whereas operating instructions educate a caller regarding procedures for operating or using a product or service, the drug effect information disclosed in *Birkhead* does not. *Birkhead*’s drug information is disclosed as including the chemical name, chemical makeup, contraindications, adverse reactions, and side effects. Hence the drug information disclosed by *Birkhead* does not teach or suggest operating instructions as claimed.

The Office Action alleges that *Birkhead* teaches operating instructions by allegedly teaching “providing instructions on adverse reaction and side effects of a product (drug).” *See*, Office Action, ¶ 3, line 8. The cited portion of *Birkhead* discloses receiving, from a drug and medical information system, adverse reactions and side effects related to drugs, not HTU instructions which are operating instructions.

The Federal Circuit has stated that claim terms are given their ordinary and customary meaning, which is the meaning the claim terms would have to a person of ordinary skill in the art at the time of the invention. *See, Phillips v. AWH Corp.* 415 F.3d 1303, 1312-13 (Fed Cir. 2005). The Federal Circuit has also stated that dictionaries may be used in claim construction if it is helpful in determining the true meaning of language used in patent claims. *See, Phillips* at 1318. Applying these guidelines, it is instructive to consult a dictionary for a definition of instructions. Merriam Webster defines “instructions” as “an outline or manual of technical procedure.”¹ *Birkhead* does not disclose an outline or manual of technical procedure. Disclosing the “effect of an operation” is distinguishable from disclosing “an outline or manual of technical

¹ instructions: **1** a: ~~PRECEPT~~ <prevailing cultural instructions> **b**: a direction calling for compliance : ~~ORDER~~ —usually used in plural <had instructions not to admit strangers> **c**: plural : **an outline or manual of technical procedure** : ~~DIRECTIONS~~ **d**: a code that tells a computer to perform a particular operation (<http://www.merriam-webster.com/dictionary/instructions> viewed March 16, 2009) [emphasis added].

procedure.” Therefore, the claimed operating instructions do not encompass information describing the “effect of operation of a drug when administered to a person.” *See*, Office Action, ¶ 3, line 12. Hence the drug information disclosed by *Birkhead*, whether taken alone or in combination with the other references, does not teach or suggest operating instructions as claimed.

Applicant disagrees with the Examiner’s unsupported assertion that the *Birkhead* drug information system, taken alone or in combination with the other references, “would obviously include dosage for administering (operating) a particular drug (product).” *See*, Office Action, p. 2-3. Applicant further objects to the Examiner’s equally unsupported assertion that “it would be obvious for the medical information topic to be operating instructions related to a medical service or device.” Applicant respectfully contests the Examiner’s apparent interpretation that a medical device or instrument includes medication or a drug. Moreover, to the extent a drug is a medical device, *Birkhead’s* providing the chemical name, chemical makeup, contraindications, adverse reactions, and side effects of the drug does not disclose operating instructions.

Other claim elements are not taught by any combination of the references, including claim 1’s recitation of “recognizing the caller’s response such that unsupported services or products are recognized and an appropriate message is played.” *See*, claim 1, line 13-14. The relied upon portions of *Birkhead* disclose that *Birkhead’s* recognition engine 122 searches its input recognition set for a match and, if there is not a successful match between the user response of the user and the input recognition set, the user is re-prompted or the call may be terminated. *See*, *Birkhead*, paragraph [0093]. Applicant respectfully asserts that recognizing a caller’s response such that unsupported services or products are recognized as claimed is not disclosed or suggested by *Birkhead’s* system of handling input that cannot be matched to an input recognition set.

The Specification of the Application highlights distinctions between the claimed subject matter and the cited references. The Specification of the current application, for example on page 7 lines 7-23, discusses illustrative techniques of an embodiment for recognizing when a caller has named an unsupported service. According to this discussion, an example of

recognizing an unsupported service is if the caller speaks “*discount packages*,” then the system may respond with a message such as “I’m sorry, Right now, I don’t have any information about *discount packages*.” Conducting this step by the disclosed embodiment requires the embodiment to recognize the request (i.e., recognizing the request regarding discount packages), and no combination of the references teaches or suggests this element as claimed. Instead, the portions of the references cited by the Examiner merely deal with requests that are unrecognized, such as when a voice recognition system simply does not understand the words spoken by the caller.

The Office Action states, “Birkhead clearly teaches that ‘In the case of an unsuccessful match between the response of the user and input recognition set i.e., the user input (caller’s response) is recognized as having no match with recognized product (unsupported product is recognized)’, the system 120 will typically reprompt the user.” See, Office Action, ¶ 4, line 7-11. Applicant respectfully submits that to recognize an unsupported service or product, as claimed, would require a successful match with *Birkhead’s* input recognition set. Indeed, *Birkhead’s* system apparently does not know if a caller has requested information regarding an unsupported drug. The Office Action apparently improperly interprets *Birkhead’s* “input recognition set” as including both supported and unsupported products, when it is not disclosed to be that inclusive. *Birkhead* does not disclose playing an appropriate message when unsupported services or products are recognized. It discloses terminating the call or reprompting the user in response to being unable to match user input to an input recognition set.

The Specification distinguishes recognition of caller responses from recognizing whether a requested service or product is supported. Figure 3, for example, and the discussion beginning on page 14, line 14 support timeout and retry steps and discuss high confidence responses, medium confidence responses, and low confidence responses. To the extent *Birkhead* and the claimed subject matter are analogous, this discussion regarding recognition of responses is analogous to the cited portion of *Birkhead*. However, the Specification of the present application has a separate discussion on page 7 beginning at line 9 that contemplates handling requests for unsupported services and products. The inclusion of these distinct discussions in the Specification highlights differences between the claimed subject matter and any systems taught

or suggested by the cited references including *Birkhead*. Disclosed embodiments in the Specification of the present application deal with unrecognized responses and unsupported products, whereas the cited references merely handle unrecognized responses.

Applicant maintains that a combination of *Birkhead* and *Siegel* would not achieve the claimed subject matter or function as described in the rejected claims. Although the references might disclose a combination that provides a user with drug information (e.g., the drug's chemical name, chemical makeup, contraindications, adverse reactions, and side effects) and allows the user to drill down in a promotion database to learn about incentives regarding the drugs, nowhere does the combination of references disclose a "how to use" call system as claimed, with HTU instructions that are operating instructions for the service or product associated with the HTU topic, that determines if a response from a caller is to be disambiguated, and that disambiguates the response by determining if the response corresponds to a category having more than one service or product. For at least these reasons, claim 1 is allowable.

Claim 2

Similar to the recitations of claim 1, claim 2 recites "HTU instructions are operating instructions for the corresponding services or products." As discussed above related to claim 1, the claimed operating instructions do not encompass the Examiner's relied upon "effect of operation of a drug when administered to a person." See, Office Action, ¶ 3, line 12. Further, whereas operating instructions educate a caller regarding how to use a service or product, the drug information disclosed in *Birkhead* does not. *Birkhead's* drug information, as disclosed by *Birkhead*, may include the chemical name, chemical makeup, contraindications, adverse reactions, and side effects, but does not disclose operating instructions. The arguments above regarding claim 1 and related to operating instructions are incorporated by reference regarding claim 2. For at least these reasons, claim 2 and its dependent claims 3-12 and 21 are allowable over the cited references, taken alone or in combination.

Claim 4

Claim 4 recites “wherein the dialog interface is for a telephone call system.” The Office Action states that *Birkhead*, “teaches of the dialog interface for a telephone call system.” *Birkhead*’s dialog interface is for a drug and medical information system, not a telephone call system. Claim 4 is allowable for at least this reason, and the reasons related to claim 1 regarding the cited references not teaching or suggesting how to use instructions that are operating instructions.

Claim 8

Claim 8 recites “determining whether the selected service or product is an unsupported service or product, and playing an appropriate message to the caller if the service or product is an unsupported service or product.” The Office Action states, “*Birkhead* teaches of reprompting if the user response does not match with the input recognition set.” See, Office Action, p. 12.

As discussed above with respect to claim 1, the relied upon portions of *Birkhead* disclose that recognition engine 122 searches its input recognition set for a match and if there is a lack of a successful match between the response of the user and the input recognition set, the user is re-prompted or the call may be terminated. See, *Birkhead*, paragraph [0093]. Again, the Office Action apparently improperly relies on *Birkhead*’s “input recognition set” as including supported and unsupported products, when it is not disclosed as that inclusive.

Applicant respectfully submits that to determine whether a selected service or product is an unsupported service or product, as claimed, would require a successful match with *Birkhead*’s input recognition set. Indeed, *Birkhead*’s system apparently does not know if a caller has requested information regarding an unsupported drug. Further, in *Birkhead*, to become a selected drug (i.e., service or product), as in claim 8, *Birkhead* would presumably require a match with *Birkhead*’s input recognition set. *Birkhead* does not disclose unmatched drugs (i.e., user input that is unmatched to elements in the input recognition set) as selected drugs, nor does it disclose other unmatched user input (e.g., unrecognized words or requests) as being a selected drug. For at least these reasons, claim 8 is allowable.

Claim 13

Claim 13 recites “HTU instructions including instructions for using the selected service or product.” The Office Action cites *Birkhead*’s paragraphs [0044]-[0056] as allegedly disclosing these elements. *See*, Office Action, p. 13, line 18. As discussed above regarding claim 1, *Birkhead*’s disclosure of drug information does not disclose instructions for using a drug. For at least these reasons, claim 13 and its dependent claims 14-20 and 22 are allowable.

Claim 19

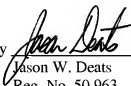
Claim 19 recites an “Unsupported Service module configured to recognize whether the caller has requested an unsupported service” [emphasis added]. The Office Action, in rejecting claim 19, simply states, “refer to rejection for claim 13 and claim 8.” *See*, Office Action, p. 14. The Office Action’s rejections of claim 13 and claim 8 do not establish a prima facie case of obviousness regarding claim 19 for at least the reason that they do not include any reference in the prior art to any Unsupported Service module, and do not include any discussion of any unsupported service. No combination of *Birkhead* and the other references discloses recognizing whether the caller has requested an unsupported service. Further, *Birkhead* discloses a drug information system, which is not disclosed as providing information on services. For at least these reasons, claim 19 is allowable.

SUMMARY

Appellant requests the Board to review and reverse the rejections of the pending claims. Appellant authorizes the Commissioner to charge \$540.00 for the Appeal Brief, to charge the \$130.00 one-month extension fee, and to charge any other fees necessary, or credit any overpayment, to the Deposit Account of Jackson Walker L.L.P., No. 10-0096.

Respectfully submitted,

JACKSON WALKER L.L.P.
Attorney for Appellant

By 
Jason W. Deats
Reg. No. 50,963

CORRESPONDENCE ADDRESS:

CUSTOMER NO. **82744**

512.236.2019

512.391.2111 (Fax)

VIII. CLAIMS APPENDIX

1. (Previously presented) A method of providing a verbal dialog interface for a caller to an automated self-service “how to use” (HTU) call system, comprising the steps of:

- grouping services or products other than the HTU call system into categories;
- associating one or more HTU topics with each service or product;
- storing at least one HTU dialog module for each HTU topic, such that the dialog module can be played as a voice message of HTU instructions to the caller, wherein HTU instructions are operating instructions for the service or product associated with the HTU topic corresponding to the HTU dialog module;
- wherein some topics have two or more dialog modules to be played as a set, different topics having different numbers of dialog modules;
- during a call from a caller, prompting the caller to name or describe a service or product or to ask for a list of services or products, and receiving a response from the caller;
- in response to the prompting step, recognizing the caller’s response such that unsupported services or products are recognized and an appropriate message is played;
- in response to the prompting step, if the caller asks for a list of services or products, providing a spoken list of categories and receiving a response from the caller;
- in response to either the preceding prompting or providing step, determining if a response from the caller is to be disambiguated;
- disambiguating the response by determining if the response corresponds to a category having more than one service or product, and if so, providing a list of services or products within that category, prompting the caller for a response, and recognizing the caller’s response;
- based on one or more of the caller’s responses, recognizing the caller’s selected service or product;
- providing the caller with a list of topics associated with the selected service or product and recognizing the caller’s selected topic; and

playing to the caller the HTU instructions in the at least one HTU dialog module stored for the selected topic, such that if the selected topic has two or more associated dialog modules to be played as a set, the caller may request to have the HTU instructions in any selected HTU dialog module in the set repeated;

wherein each of the above prompting and providing steps are part of a unique dialog module associated with that step, such that each dialog module has at least one timeout process and at least one retry process.

2. (Previously presented) A method of providing a verbal dialog interface for a caller to an automated self-service "how to use" (HTU) call system, comprising the steps of:

grouping services or products other than the HTU call system into categories;

associating one or more HTU topics with each service or product;

storing at least one HTU dialog module for each topic, such that the dialog module can be played as a voice message of HTU instructions to the caller, wherein HTU instructions are operating instructions for the corresponding services or products;

wherein some topics have more two or more dialog modules to be played as a set, different topics having different numbers of dialog modules;

during a call from a caller, prompting the caller to select a service or product for which the caller desires HTU instructions, and receiving one or more service or product responses from the caller;

based on one or more of the caller's responses, recognizing the caller's selected service or product;

providing the caller with a list of topics associated with the selected service or product and recognizing the caller's selected topic;

playing to the caller the HTU instructions in the at least one HTU dialog module stored for the selected topic, such that if the selected topic has two or more associated dialog module to be played as a set, the caller may request to have the HTU instructions in any selected HTU dialog module in the set repeated.

3. (Previously presented) The method of Claim 2, further comprising prompting the caller for the caller's phone number.

4. (Original) The method of Claim 2, wherein the dialog interface is for a telephone call system.

5. (Previously presented) The method of Claim 2, wherein at least one response from the caller is analyzed using natural language speech recognition techniques.

6. (Previously presented) The method of Claim 21, wherein at least one of the steps of (a) prompting the caller to name or describe a service or product or to request a list of services or products and (b) providing a list of categories to the caller if the caller requests a list of services/products includes at least one timeout process.

7. (Previously presented) The method of Claim 21, wherein at least one of the steps of (a) prompting the caller to name or describe a service or product or to request a list of services or products and (b) providing a list of categories to the caller if the caller requests a list of services or products includes at least one retry process.

8. (Previously presented) The method of Claim 2, further comprising, in response to receiving one or more service or product responses from the caller, recognizing the service or product selected by the caller, determining whether the selected service or product is an unsupported service or product, and playing an appropriate message to the caller if the service or product is an unsupported service or product.

9. (Previously presented) The method of Claim 2, wherein the step of providing the caller with a list of topics includes listing the topics in order of frequency of being requested.

10. (Previously presented) The method of Claim 2, wherein the selected service or product is a pricing service, and the method further comprises determining whether the caller's phone number is stored.

11. (Previously presented) The method of Claim 2, further comprising the step of prompting the caller for a survey response, after the step of playing the HTU instructions to the caller.

12. (Previously presented) The method of Claim 2, further comprising recognizing a spoken request by the caller for help, and providing help information to the caller.

13. (Previously presented) A system for providing a verbal dialog interface for a caller to an automated self-service "how to use" (HTU) call system, comprising:

- a Get Service Name module configured to prompt the caller to name or describe a service or product other than the HTU call system or to ask for a list of services or products other than the HTU call system, and for recognizing the caller's response;

- a Get Category Name module configured to provide the caller with a list of service or product categories, to receive a selection from the caller, and to recognize the caller's selection from the list of categories;

- a Get Information module configured to provide the caller with a list of topics associated with a selected service or product, and to recognize the caller's selected topic;

Information modules for providing the caller with verbal HTU instructions associated with the selected topic, the HTU instructions including instructions for using the selected service or product; and

wherein at least one topic has more than one associated Information module, different topics having different numbers of Information modules.

14. (Previously presented) The system of Claim 13, further comprising at least one Survey module, operable to prompt the caller to speak a response to a survey question, and to recognize the caller's response.

15. (Previously presented) The system of Claim 13, wherein at least one of the modules contains at least one timeout process.

16. (Previously presented) The system of Claim 13, wherein at least one of the modules contains at least one retry process.

17. (Previously presented) The system of Claim 13, wherein at least one of the modules is configured to recognize a spoken request by the caller for help, and to provide verbal help information corresponding to that module.

18. (Previously presented) The system of Claim 13, wherein the list of topics is presented to the caller in order of frequency of being requested.

19. (Previously presented) The system of Claim 13, further comprising an Unsupported Service module configured to recognize whether the caller has requested an unsupported service, and to provide an appropriate verbal message to the caller in response.

20. (Previously presented) The system of Claim 13, further comprising a Pricing module configured to recognize a request by the caller for pricing, and to transfer the caller to a source of pricing information.

21. (Previously presented) The method of Claim 2, wherein prompting the caller to select a service or product and receiving one or more service or product responses from the caller comprises:

prompting the caller to name or describe a service or product or to request a list of services or products;

if the caller requests a list of services/products, providing a list of categories to the caller;

identifying a response from the caller that corresponds to a particular category having more than one service or product; and

disambiguating the identified response, wherein the disambiguating includes providing a list of services or products within the particular category and prompting the caller for a selection.

22. (Previously presented) The system of Claim 13, further comprising:

a Need Disambiguation decision module configured to identify whether the caller has selected a particular category having more than one associated service or product; and

a Disambiguation module configured to provide the caller with a list of services or products associated with the particular category from which to select.

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IX. EVIDENCE APPENDIX

NONE

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X. RELATED PROCEEDINGS APPENDIX

NONE